

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

BEFORE THE
ILLINOIS COMMERCE COMMISSION

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ILLINOIS
COMMERCE COMMISSION

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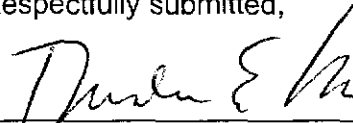
In the Matter of the Joint Application of Century)
Telephone and Gallatin River Telephone)
Company for Consent and Approval of a)
Change of Control.)

Case No. 07-0003
CHIEF CLERK'S OFFICE

MOTION TO INTERVENE

NOW COMES COMMUNICATIONS WORKERS OF AMERICA ("CWA"), and hereby moves to intervene in the above-captioned proceeding pursuant to the Illinois Administrative Code Section 200.200. This motion is made because CWA has a real and substantial interest in these proceedings. It is so situated that the disposition of these proceedings without its participation may impair or impede its ability to protect that interest. Its participation in these proceedings will contribute to a just result. Its interest in these proceedings is not represented by any existing party. Granting this Motion to Intervene will not unduly delay these proceedings or unjustly prejudice any existing party. The reasons for this Motion are made more clear in the attached Memorandum.

Respectfully submitted,



Theodore E. Meckler (0006201)
CWA District 4 Counsel
Communications Workers of America
20525 Center Ridge Road, Room 700
Cleveland, Ohio 44116
Telephone: (440) 333-6363
FAX: (440) 333-1491
Email: tmeckler@cwa-union.org

**ATTORNEY FOR CWA, APPLICANT FOR
INTERVENTION**

MEMORANDUM

I. INTRODUCTION

On January 12, 2007, Century Telephone (Century) and Gallatin River Telephone Company (Gallatin) filed a Joint Application with the Illinois Commerce Commission ("ICC" or "the Commission"), seeking approval of the proposed proposed merger of Gallatin into Century under the provisions of Section 7-203 and Section 7-204. CWA is a labor organization that represents about fifty (50) employees at Gallatin and more than about two hundred twenty (220) employees at Century across the nation. This proposed merger and the decisions of this Commission with respect thereto are likely to have considerable impact on the employees CWA represents both as employees and as consumers.

II. LAW AND ARGUMENT

Consistent with the requirement of 83 Illinois Administrative Code part 200.200, CWA is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and who will not unduly delay the proceeding or prejudice any existing party.

CWA's interest is not represented by existing parties. It will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding. Its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. It agrees to be bound by record with respect to other matters previously made a part of this proceeding.

CWA is a National labor organization which represents employees in the telecommunications industry (*inter alia*) including a large number of employees employed by both Century and Gallatin. To the extent that decisions made in this case may affect those employees who are in CWA's bargaining unit, and the competitive marketplace in Illinois, granting CWA's intervention herein is necessary and proper so as to permit it to protect the public interest and the interest of its bargaining unit members.

CWA intends to be active in the proceeding. CWA is and continues to be an interested party in this case and recognizes the need for a balanced viewpoint with respect to the issues

relevant in this case. Because of its unique situation, CWA is in an excellent position to provide information and an outlook on various aspects of this case the current parties may not be able to provide.

CWA's intervention will not unduly broaden the issues to be determined by this proceeding.

CWA represented employees at these companies have an interest as workers and as consumers in the impact of the proposed merger on the financial, technical, and managerial capability of the merged entity, as well as the impact of the proposed merger on employment and the quality of service provided to customers.

Counsel for CWA in this proceeding is a member of the Ohio Bar (#0006201). His name and address are as follows:

Theodore E. Meckler, District Counsel
Communications Workers of America
20525 Center Ridge Road, Room 700
Cleveland, Ohio 44116
Telephone: (440) 333-6363
FAX: (440) 333-1491
Email: tmeckler@cwa-union.org

The above-named attorney is authorized to accept service on behalf of CWA of any pleadings, orders, or other documents filed or served upon the parties in this proceeding. CWA agrees to accept service by electronic means.

CONCLUSION

WHEREFORE, CWA respectfully requests that this Commission grant it leave to intervene so that it may be made a party to this case.

Respectfully submitted,




Theodore E. Meckler (0006201)
CWA District 4 Counsel
Communications Workers of America
20525 Center Ridge Road, Room 700
Cleveland, Ohio 44116
Telephone: (440) 333-6363
FAX: (440) 333-1491
Email: tmeckler@cwa-union.org

**ATTORNEY FOR CWA, APPLICANT FOR
INTERVENTION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 28th day of January, 2007, via U.S. mail, postage prepaid and electronic service.


Theodore E. Meckler
**Attorney for CWA, Applicant for
Intervention**

Michael G. McNally
Case Manager
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
E-mail: mmcnally@icc.illinois.gov

Dennis K. Muncy
Atty. for Applicants
Meyer Capel, a Professional Corporation
306 W. Church St.
P.O. Box 6750
Champaign, IL 61826-6750
E-mail: dmuncy@meyercapel.com

Joseph D. Murphy
Atty. for Applicants
Meyer Capel, a Professional Corporation
306 W. Church St.
P.O. Box 6750
Champaign, IL 61826-6750
E-mail: jmurphy@meyercapel.com

VERIFICATION

I, Theodore E. Meckler, first being duly
(Name)
sworn upon oath depose and say that I am District 4 Counsel
(Title)
of C.W.A., District 4, an unincorporated association formed
(Type of Entity)
under the laws of the state of Ohio; that I have read
the above and foregoing ^{motion to intervene} petition by me subscribed and know the contents
thereof; that said contents are true in substance and in fact, except as to
those matters stated upon information and belief, and as to those, I believe
same to be true.

Theodore E. Meckler
Name

District 4, Counsel
Title

Subscribed and sworn to before me
this 5th day of February,
2007.

Lisa R. Steenstra
Notary Public, Illinois 01/10

LISA R. STEENSTRA
Notary Public - State of Ohio
Recorded in Lorain County
My Commission Expires February 10, 2007